



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
Division of Health Care Facility Licensure & Certification  
67 Forest Street, Marlborough, MA 01752

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February 25, 2020

Andrew M. Fuqua  
SVP & General Counsel  
Cambridge Health Alliance  
1493 Cambridge Street  
Cambridge, MA 02139  
[afuqua@challiance.org](mailto:afuqua@challiance.org)

BY EMAIL ONLY

Re: Cambridge Health Alliance – Review of Response Following Essential Service Finding

Dear Mr. Fuqua:

On February 18, 2020 the Department of Public Health ("Department") received from you, on behalf of Cambridge Health Alliance – Somerville Hospital Campus ("Hospital"), a response to our February 4, 2020 letter indicating that the Hospital must file a plan with the Department detailing how access to services will be maintained following the conversion of its Satellite Emergency Facility ("SEF") to an urgent care center. Thank you for responding to our request in a timely and comprehensive manner.

Pursuant to 105 CMR 130.122(G) the Department has completed its review of the submitted access plan. As a result of this review, the Department has prepared the following comments:

- (1) **Location and Service Capacity of Alternative Delivery Sites:** In its letter of February 4, 2020, the Department requested information on the location and service capacity of alternative delivery sites.
  - The Hospital's response provided information on only one alternative site, the Cambridge Health Alliance - Cambridge Hospital Campus Emergency Department ("Cambridge ED"). While the Department recognizes the proximity of the Cambridge ED it is unlikely that the Cambridge ED will provide the emergency services for all of the patient population served by the Somerville SEF. Please provide information on the location, service capacity and travel times for additional alternative delivery sites.

(2) **Access to Services at Alternative Delivery Sites:** In its letter of February 4, 2020, the Department requested information regarding the Hospital's protocol that describes how patients in the Hospital's service area will obtain the services at alternative delivery sites.

- The Hospital's response indicates that approximately 60 percent of Somerville SEF patients present with conditions that could be treated in an urgent care setting, implying that approximately 40 percent of Somerville SEF patient present with higher level emergency needs. It is unclear how the urgent care center will assess a patient's condition to determine the level of care needed and determine how the patient will be transferred to an appropriate alternative facility with emergency services.

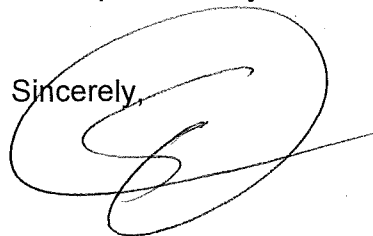
Please provide a protocol that describes how, when, and who will: determine the level of care required by each patient; determine which alternative service to which the patient will be transferred; initiate the transfer to the alternative service; communicate with providers at the alternative receiving service; and arrange for transportation to the alternative receiving service.

Additionally, please note that under MGL c. 111 §. 51 a hospital must submit architectural plans and receive written approval of those plans prior to commencing construction, alterations or additions.

Under the provisions of 105 CMR 130.122(G), the Hospital must submit a timely response to the comments of the Department. Please submit your comments within 10 days of your receipt of this letter to my attention, in order that we may complete our review of the pending closure.

Thank you for your continued cooperation in this process. If you have any questions, please contact me at (617) 753-8134.

Sincerely,



Stephen Davis  
Complaint Unit Manager/Deputy Director

Cc: E. Kelley  
S. Lohnes  
M. Callahan  
K. Haynes  
S. Moore